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June 24, 2020

BY ECF

Honorable Peggy Kuo
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Danielle Rosenfeld, et. ano. v. Tara Lenich, et al., 18 CV 6720 (NGG) (PK)

Your Honor:

I am an attorney in the office of James E. Johnson, Corporation Counsel of the City of New York, counsel for defendants City of New York, Kings County District Attorney Eric Gonzalez, Lu-Shawn Thompson as administrator of the Estate of Kenneth Thompson, Mark Feldman, William Schaefer, Brian Donohue, William Power, Michael Dowling, Joseph Piraino and Robert Kenavan (collectively, "City defendants") in the above-referenced matters. I write jointly with plaintiffs' counsel, Samuel Shapiro, Esq., to respectfully request an extension from June 26, 2020 to July 24, 2020 for the parties to submit a proposed settlement in the above-referenced matter and to move for preliminary approval from the District Court. The parties appear to be making significant progress and are reaching the point where the practical implementation of the settlement is provided for. Once the agreement is finalized, plaintiffs will also need to prepare a motion for preliminary approval. For these reasons the parties respectfully request a thirty day extension of time in which to submit an agreement for preliminary approval.

The parties thank the Court for its consideration of this application.

Respectfully submitted,

/s/

Joshua J. Lax
Senior Counsel
Special Federal Litigation Division

cc: All counsel (**By ECF**)